



THE CITY OF NEW YORK
LAW DEPARTMENT

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NEW YORK, NY 10007

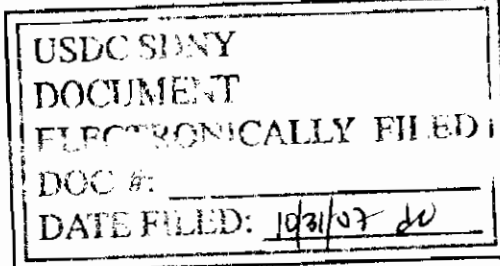
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October 26, 2007

BY HAND DELIVERY

The Honorable Barbara S. Jones
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007



Re: Lawrence Hamlin v. City of New York, et al.,
07 CV 7547 (BSJ)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and the attorney assigned to the defense of the above referenced matter. I write to respectfully request an enlargement of time from the present date until December 28, 2007, to answer or otherwise respond to plaintiff's complaint on behalf of defendants the City of New York and Raymond Kelly. Additionally, without appearing on his behalf or making any representations as to the adequacy of service or otherwise, this office respectfully requests a similar enlargement of time until December 28, 2007 on behalf of defendant Christopher Jennings.¹ This is defendants' first request for an enlargement of time to respond to plaintiff's complaint. Plaintiff's counsel, Nicole Bellina, Esq., consents to this request.

In accordance with this office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. Plaintiff alleges that, on or about July 2, 2005, a 9:00 p.m., he was arrested and subjected to excessive force by members of the New York City Police Department on Fulton and Thomas Boyland Avenues. Specifically, plaintiff claims that he was "unlawfully approached, assaulted, battered, sprayed with a chemical agent," and subsequently arrested and imprisoned. Plaintiff maintains that all criminal charges against him were dismissed. As a result of the alleged incident, plaintiff alleges he suffered violations of his rights, including but not limited to, physical pain and suffering, emotional

¹ Upon information and belief, Deputy Inspector Campbell has not yet been properly served with process in this action.

trauma, and damage to property. Accordingly, it is necessary for defendant to acquire as much information as possible concerning this matter in order to properly assess the case and respond to the complaint. To that end, this office has already forwarded to plaintiff for execution a N.Y.C.P.L. §160.50 release so that we can access the sealed records from his underlying criminal prosecution, including the criminal court and District Attorney's file. In addition, plaintiff was also sent a HIPAA compliant medical release for his execution so that we may access his relevant medical records.

Accordingly, defendants City of New York and Raymond Kelly respectfully request that their time to respond to the complaint be extended to December 28, 2007. Additionally, without appearing on his behalf or making any representations as to the adequacy of service or otherwise, this office respectfully requests a similar enlargement of time on behalf of defendant Christopher Jennings.² Thank you for your consideration of this request.

Respectfully submitted,



Jessica T. Cohen (JC 0044)
Assistant Corporation Counsel

cc: Nicole Bellina, Esq. (by regular mail)
Stoll, Glickman & Bellina
Attorneys for Plaintiff
71 Nevins Street
Brooklyn, New York 11217

Application, GRANTED.

SO ORDERED
Dated:



BARBARA S. JONES
U.S.D.J.

² The enlargement will allow this office time to conduct its representation investigation with respect to defendant Jennings pursuant to General Municipal Law §50-K, and it should also allow for the submission of a joint response on behalf of all defendants.